

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	No. 13-CR-10200-GAO
v.)	
)	
DZHOKHAR TSARNAEV)	

MOTION TO ENLARGE TIME TO FILE
MOTION FOR CHANGE OF VENUE

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests that the Court enlarge the time for filing a Motion to Change Venue. Defense counsel now intend to file a Motion to Change Venue; however, because of the need for additional analysis of data and media the defense cannot meet the currently set June 18, 2014 deadline, and seeks an enlargement of time to file the Motion.

1. At the November 12, 2013 status conference, the Court directed that any change of venue motion be filed by February 28, 2014. [DE 148] Because of the work involved in making the decision whether to pursue a change of venue is warranted and supported by research, the defense moved to vacate the February 28, 2014 filing deadline, and the Court vacated the filing deadline. [DE 154, 158]. At the February 12, 2014 status conference, the Court reset the filing deadline to June 18, 2014. [2/12/14 Transcript at. 19].

2. The defense has now completed sufficient preliminary research to determine that a change of venue motion should be filed; however, additional and detailed expert

analysis of the venue research and media surrounding this case is required to support a motion to change venue.

3. So that the work necessary to supporting a change of venue motion can be completed and presented to the Court, counsel seek an enlargement of time to, and including, Monday, August 3, 2014 to file a Change of Venue Motion, or, alternatively, six (6) weeks after approval of funding for the additional work.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

/s/ Judy Clarke

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Certificate of Service

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/s/ Judy Clarke